

QUINN EMANUEL URQUHART & SULLIVAN LLP

51 Madison Avenue, 22nd Floor

New York, New York 10010

Telephone: (212) 849-7000

Facsimile: (212) 849-7100

Susheel Kirpalani

Jonathan E. Pickhardt

Andrew S. Corkhill

Matthew Scheck

Ellison Ward Merkel

Attorneys for Omega Advisors Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Quinn Emanuel Urquhart & Sullivan LLP hereby appears
in the above-captioned cases (the “Chapter 11 Cases”) pursuant to Rule 9010(b) of the Federal

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as counsel to Omega Advisors Inc. (“Omega”), and requests, pursuant to Bankruptcy Rules 2002, 9007, and 9010 and sections 342 and 1109(b) of chapter 11, title 11 of the United States Code (the “Bankruptcy Code”), that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the following:

Susheel Kirpalani
Jonathan E. Pickhardt
Andrew S. Corkhill
Matthew Scheck
Ellison Ward Merkel
QUINN EMANUEL URQUHART & SULLIVAN LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
susheelkirpalani@quinnemanuel.com
jonpickhardt@quinnemanuel.com
andrewcorkhill@quinnemanuel.com
matthewscheck@quinnemanuel.com
ellisonmerkel@quinnemanuel.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, a request for service of all orders and notices of any application (including those required by Bankruptcy Rule 2002), motion, petition, pleading, request, chapter 11 plan, disclosure statement, complaint, or demand, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise filed or made with regard to the Chapter 11 Cases and any and all adversary proceedings therein.

PLEASE TAKE FURTHER NOTICE that Omega, by filing this notice of appearance, or any prior or later appearance, pleading, claim, or suit, does not intend to waive (1) the right to have final orders in non-core matters entered only after *de novo* review by a judge of a United States District Court (a “District Court”), (2) the right to trial by jury in any proceeding so triable

in this case or any case, controversy or proceeding related to this case, (3) the right to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a Debtor or any other entity either in this case or in any other action are expressly reserved.

PLEASE TAKE FURTHER NOTICE that Omega does not consent to the entry of final orders or judgments by the Court if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: December 10, 2018
New York, New York

QUINN EMANUEL URQUHART
& SULLIVAN LLP
By: /s/ Susheel Kirpalani
Susheel Kirpalani
Jonathan E. Pickhardt
Andrew S. Corkhill
Matthew Scheck
Ellison Ward Merkel

51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Omega Advisors Inc.